

RQ-2

April 12, 2018

PAUL WEISS, TREASURER
PRIME POLICY GROUP
LLC/BURSON-MARSTELLER POLITICAL
ACTION COMMITTEE
1110 VERMONT AVENUE, NW SUITE 1000
WASHINGTON, DC 20005

Response Due Date 05/17/2018

IDENTIFICATION NUMBER: C00201863

REFERENCE: AMENDED YEAR-END REPORT (07/01/2017 - 12/31/2017), RECEIVED 01/31/2018

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in enforcement action. Additional information is needed for the following 4 item(s):

- 1. The beginning cash balance of this report does not equal the ending balance of your Mid-Year Report (1/1/17 6/30/17). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (52 U.S.C. §30104(b) (formerly 2 U.S.C. § 434(b)(1)))
- 2. The totals listed on Lines 6(c), 11a(i), 11a(ii), 11a(iii), 11(d), 19, and 20, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (52 U.S.C. §30104(b) (formerly 2 U.S.C. §434(b)))
- **3.** Schedule B supporting Line 21(b) of your Detailed Summary Page discloses a disbursement for "Accounting adjustment resulting from internal audit" for \$7,403.14. In a miscellaneous electronic submission ("FEC Form 99") you state, "This is to confirm that we are making a one-time adjustment of \$7,403.14. We have examined PAC financial records back to 2012 and have found that the

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discrepancies pre-date those records". Please provide any clarifying information as to the details of this disbursement and why this activity was not disclosed on the original report covering the period during which it took place.

4. On Schedule B, you have disclosed disbursements to federal candidates. Commission regulations require that these itemized disbursements include the recipient's full name, complete address, date, amount, state of election, office sought (House, Senate, or President), and district (if applicable). Please amend your report to include the state of election, office sought, and district. (11 CFR §104.3 (b)(3))

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1185.

Sincerely,

Michael Beckman

Campaign Finance Analyst Reports Analysis Division

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